State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Lance R. Miller, Acting Director
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

FEB 22 1990

Raymond Basso, Chief
New Jersey Compliance Branch
USEPA - Region II
26 Federal Plaza, Room 747
New York, NY 10278

Dear Mr. Basso:

Re: SCP Carlstadt Superfund Site (SCP site)
Ground Water Classification

This letter is a response to the request made by EPA to provide, in writing, a detailed justification for the ground water classification of GW-2 at the SCP site. This correspondence will also serve as documentation of the ground water classification for the administrative record of the SCP site.

Three aquifers are recognized at the SCP site. Starting at the surface and proceeding downward these aquifers are as follows: the shallow or water table aquifer; the till aquifer; and the bedrock aquifer. The bedrock aquifer is utilized as a potable water supply and is classified by the NJDEP as GW-2. The rationale for this classification is discussed below.

Regarding the classification of the ground waters at the SCP site, the bedrock aquifer is classified as GW-2 because it is currently being used as a potable supply with no treatment required other than possible conventional water treatment (Refer N.J.A.C. 7:9-6.5(c)).

Ground-water samples taken in February 1989 document TDS levels to range from 390 ppm to 3240 ppm in the shallow-water-table wells surrounding the site. The Potential Responsible Parties (PRPs) contend that regardless of the impacts to a drinking water aquifer the aquifer classification of the two (2) surficial aquifers should be GW-3 based on the amount of total dissolved solids (TDS) present. TDS in the range of 500 mg/l to 10,000 mg/l has a GW-3 classification when the TDS, "...occurs in water without the influence of man (natural occurring TDS)." (N.J.A.C. 7:9-6.3). The area of the SCP facility and the area immediately proximate to the site have been impacted by man's activities and therefore, true (Natural) TDS readings may not be obtainable. The TDS value collected may be representative of the

area as it exists today and it may not meet the stipulated intent of the N.J.A.C. 7:9-6 et seq. regulations.

However, pursuant to N.J.A.C. 7:9-6.4, and regardless of the natural TDS concentration in these waters the ground water clean-up criteria that must be applied are equivalent to GW-2 standards because these waters recharge the bedrock aquifer which is being used as a potable water supply.

The procedure for proposing a change in classification for a single facility is by establishing an alternate concentration limit (ACL) pursuant to N.J.A.C. 7:14A-6.15(e)2.

The Department has previously communicated its position to your staff in our comments on the draft Remedial Investigation report dated September 2, 1988. I would like to assure you that the classification was and remains consistent with NJDEP's most recent ground water classification procedures. This letter should assist you and your staff in addressing any additional questions posed by the PRPs.

If you should any questions please contact me or Pamela Lange, of my staff, at (609) 633-1455.

Sincerely,

David Zervas, Chief
Bureau of Federal Case Management

PL:mcs

c: Janet Feldstein, USEPA, Region II
Pamela Lange, DHWM/BFCM
Linda Welkom, DWR/BGWPA
Steven MacGregor, DHSM/BEERA

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